

Sealing Hearing: July 16, 2019 at 2:00 p.m.

Sealing Objections Due: June 28, 2019 at 12:00 p.m.

Sealing Reply Due: July 9, 2019 at 4:00 p.m.

Authorization Hearing: August 12, 2019 at 10:00 a.m.

Authorization Objections Due: July 25, 2019 at 5:00 p.m.

Authorization Reply Due: August 5, 2019 at 12:00 p.m.

Juan P. Morillo (*pro hac vice*)
Gabriel F. Soledad
Daniel Pulecio-Boek
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
1300 I Street, NW, Suite 900
Washington, D.C. 20005
Telephone: (202) 538-8000
Facsimile: (202) 538-8100
Email: juanmorillo@quinnemanuel.com
Email: gabrielsoledad@quinnemanuel.com
Email: danielpulecioboek@quinnemanuel.com

Scott C. Shelley
Samantha Gillespie (*pro hac vice*)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010
Telephone: (212) 849-7000
Facsimile: (212) 849-7100
Email: scottshelley@quinnemanuel.com
Email: samanthagillespie@quinnemanuel.com

Eric Winston (*pro hac vice*)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
865 South Figueroa Street, 10th Floor
Los Angeles, California 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100
Email: ericwinston@quinnemanuel.com

Sara C. Clark (*pro hac vice*)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
711 Rusk Street, Suite 500
Houston, Texas 77002
Telephone: (713) 221-7000
Facsimile: (713) 221-7100
Email: saraclark@quinnemanuel.com

Counsel for the Foreign Representative

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PERFORADORA ORO NEGRO, S. DE R.L.
DE C.V., *et al.*

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 18-11094 (SCC)
(Jointly Administered)

NOTICE OF HEARINGS

PLEASE TAKE NOTICE that a hearing (the “Sealing Hearing”) will be held before the Honorable Shelley C. Chapman of the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) on **July 16, 2019 at 2:00 p.m. (Prevailing Eastern Time)**, in Courtroom 623, One Bowling Green, New York, New York 10004, to consider the motion of the foreign representative of Perforadora Oro Negro, S. de R.L. de C.V. and Integradora de Servicios Petroleros, S.A.P.I. de C.V. (together, the “Debtors”) seeking entry of an order pursuant to Bankruptcy Code section 107(b), Rule 9018 of the Federal Rules of Bankruptcy Procedure, and Local Bankruptcy Rule 9018-1 authorizing the foreign representative to file an un-redacted copy of the *Motion of Foreign Representative for Order Pursuant to Bankruptcy Code Sections 105(a), 362, 363, 1520(a)(2), 1520(a)(3) and 1521(a)(7) Authorizing Entry into a Litigation Interest Agreement and Granting Related Relief* and exhibits thereto under seal [ECF 204] (“Motion to Seal”).

PLEASE TAKE FURTHER NOTICE that any remaining objections to the Motion to Seal must (i) conform to the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and the Local Rules of the Bankruptcy Court for the Southern District of New York (the “Local Rules”); (ii) be made in writing; (iii) state with particularity the grounds therefor; (iv) be filed with the Bankruptcy Court (with a copy to the Judge’s chambers); and (v) be served upon Quinn Emanuel Urquhart & Sullivan, LLP, 51 Madison Avenue, 22nd Floor, New York, New York 10010, Attn: Scott C. Shelley, Esq., so as to be received no later than **Friday, June 28, 2019 at 12:00 p.m. (Prevailing Eastern Time)**. Any Reply by the foreign representative of the Debtors must be filed by **Tuesday, July 9, 2019 at 4:00 p.m. (Prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that a hearing (the “Authorization Hearing”, and together with the Sealing Hearing, the “Hearings”) will be held before the Honorable Shelley C. Chapman of the Bankruptcy Court on **August 12, 2019 at 10:00 a.m. (Prevailing Eastern Time)**, in Courtroom 623, One Bowling Green, New York, New York 10004, to consider the *Motion of Foreign Representative for Order Pursuant to Bankruptcy Code Sections 105(a), 362, 363, 1520(a)(2), 1520(a)(3) and 1521(a)(7) Authorizing Entry into a Litigation Interest Agreement and Granting Related Relief* [ECF 205] (“Motion for Authorization”).

PLEASE TAKE FURTHER NOTICE that any objections to the Motion for Authorization must (i) conform to the Bankruptcy Rules and the Local Rules; (ii) be made in writing; (iii) state with particularity the grounds therefor; (iv) be filed with the Bankruptcy Court (with a copy to the Judge’s chambers); and (v) be served upon Quinn Emanuel Urquhart & Sullivan, LLP, 51 Madison Avenue, 22nd Floor, New York, New York 10010, Attn: Scott C. Shelley, Esq., so as to be received no later **Thursday, July 25, 2019 at 5:00 p.m. (Prevailing Eastern Time)**. Any reply by the foreign representative of the Debtors must be filed by **Monday, August 5, 2019 at 12:00 p.m. (Prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend any hearing set by the Court, and failure to appear may result in relief being granted upon default.

PLEASE TAKE FURTHER NOTICE that you need not appear at the Hearings if you do not object to the relief requested in the Motion to Seal or the Motion for Authorization.

PLEASE TAKE FURTHER NOTICE that the Hearings may be continued or adjourned from time to time without further notice other than an announcement of the adjourned date or dates at the Hearings or at a later hearing.

[signature page follows]

Dated: June 27, 2019
New York, New York

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

/s/ Gabriel F. Soledad

Gabriel F. Soledad

Juan P. Morillo (*pro hac vice*)

Daniel Pulecio-Boek

1300 I Street, NW, Suite 900

Washington, D.C. 20005

Telephone: (202) 538-8000

Facsimile: (202) 538-8100

Email: gabrielsoledad@quinnemanuel.com

Email: juanmorillo@quinnemanuel.com

Email: danielpulecioboek@quinnemanuel.com

Scott C. Shelley

Samantha Gillespie (*pro hac vice*)

51 Madison Avenue, 22nd Floor

New York, NY 10010

Telephone: 212-849-7000

Facsimile: 212-849-7100

Email: scottshelley@quinnemanuel.com

Email: samanthagillespie@quinnemanuel.com

Eric Winston (*pro hac vice*)

865 South Figueroa Street, 10th Floor

Los Angeles, California 90017

Telephone: (213) 443-3000

Facsimile: (213) 443-3100

Email: ericwinston@quinnemanuel.com

Sara C. Clark (*pro hac vice*)

711 Rusk Street, Suite 500

Houston, Texas 77002

Telephone: (713) 221-7000

Facsimile: (713) 221-7100

Email: saraclark@quinnemanuel.com

Counsel for the Foreign Representative